

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

THE KATIROLL COMPANY INC.,

Plaintiff,

v.

KATI JUNCTION INC., DARPAN BHARARA, MD  
AKHTER HOSSAIN, MD JEWEL HOSSAIN, MD  
KAMAL HOSSAIN, MD TARIQUL ISLAM, MD NUR  
NOBI, SHAIKH NUHUL ALAM and NURUN NABI  
CHOWDHURY,

Defendants.

14 Civ. 1750 (SAS)

ECF Case

**STIPULATION AND [PROPOSED] ORDER OF DISMISSAL  
WITH AND WITHOUT PREJUDICE  
SUBJECT TO CONFIDENTIAL SETTLEMENT AGREEMENT**

Plaintiff, The KatiRoll Company Inc. ("TKRC") and Defendants Kati Junction Inc., Darpan Bharara, Md Akhter Hossain, Md Jewel Hossain, Md Kamal Hossain, Md Tariqul Islam, Md Nur Nobi, and Nurun Nabi Chowdhury ("the Settling Defendants") by and through their counsel of record, hereby stipulate as follows:

WHEREAS, TKRC and the Settling Defendants (together "the Settling Parties") have reached a confidential settlement agreement (the "Agreement") to settle all their claims in this action; and

WHEREAS, pursuant to the Agreement, the Settling Parties have agreed to dismiss all of their claims with prejudice except to enforce the terms of the Agreement;

WHEREAS, the Settling Parties have agreed that each of them will bear its own attorneys' fees and costs; and

WHEREAS, Defendant Shaikh Nuhul Alam asserted counterclaims against TKRC but did not appear for his deposition (originally noticed for February 26, 2015) and was not located since that time after his counsel made repeated attempts to find him.

NOW THEREFORE, the Settling Parties agree and stipulate and respectfully request that the Court dismiss all claims by the Settling Parties with prejudice, subject to the terms of the Agreement, and dismiss all claims and counterclaims concerning Shaikh Nuhul Alam in this action without prejudice, pursuant to Rule 41, Fed. R. Civ. P., with each party to bear its own attorneys' fees and costs.

Respectfully submitted,

*Elizabeth Shieldkret* 12/28/15

Elizabeth Shieldkret (ES 0625) Date  
67-20 Exeter Street  
Forest Hills, NY 11375  
(718) 997-0290

Attorney for Plaintiff,  
The KatiRoll Company Inc.

*Kalpana Nagampalli*

12/30/15

Stephen E. Feldman (SF-5630) Date  
Kalpana Nagampalli (KN- 2807)  
Nupur Shah (NS-1609)  
Feldman Law Group, P.C.  
220 E 42nd Street, Suite 3304  
New York NY 10017  
Tel: 212-532-8585  
Fax: 212-532-8598

Attorneys for Defendants,  
Kati Junction, Inc., Darpan Bharara,  
MD Akhter Hossain, MD Jewel  
Hossain, MD Kamal Hossain, MD  
Tariqul Islam, MD Nur Nobi, Shaikh  
Nuhul Alam and Nurun Nabi  
Chowdhury

Theodore C. Anderson  
Kilgore & Kilgore, PLLC  
30 Wall Street  
8th Floor  
New York, NY 10005-2205

Richard Schurin  
STERN & SCHURIN LLP  
Long Island Office  
410 E. Jericho Turnpike  
Mineola, NY 11501

Tel: 516-248-0300  
Fax: 516-283-0277

Attorneys for Defendants,  
Kati Junction, Inc., Darpan Bharara,  
MD Akhter Hossain, MD Jewel  
Hossain, MD Kamal Hossain, MD  
Tariqul Islam, MD Nur Nobi, and  
Nurun Nabi Chowdhury

SO ORDERED:

---

Shira A. Scheindlin U.S.D.J.

Dated: New York, New York

\_\_\_\_\_, 2015